
From: Allison Castellan - NOAA Federal
To: Wu, Jennifer
CC: Melissa Rada - NOAA Affiliate
Sent: 9/8/2014 11:35:56 AM
Subject: Re: Latest Draft of Response to Comments
Attachments: Pesticides and Toxics Response to Comments.doc

Hi Jenny--

I haven't forgotten about your earlier email...just been working on it in fits and starts between other things so a little slow going. I combined your summary comments with the summary comments Melissa and I had already developed for the general pesticides issue as well as the forestry specific comments. In doing so, I also reorganized slightly to avoid redundancy among comments and went ahead and developed some very rough responses to the rest of the questions. I imagine the responses will need to be fine-tuned significantly once we finalize the language for the pesticide rationale. Take a look at the attached and see what you think.

Allison

On Tue, Aug 26, 2014 at 2:49 PM, Wu, Jennifer <Wu.Jennifer@epa.gov> wrote:

Hey Allison and Melissa, thanks for this. I've stopped working on the pesticides responses until we finish up the rationale, but just FYI, here's what I have so far. Our Pesticide subcommittee was fine with the summary of comments, but last time I reread them, I felt like they were pretty rough, so feel free to clean up.

Thanks to you and Melissa for taking these on - Jenny

From: Allison Castellan - NOAA Federal [mailto:allison.castellan@noaa.gov]
Sent: Tuesday, August 26, 2014 11:39 AM
To: Carlin, Jayne
Cc: Waye, Don; Henning, Alan; Wu, Jennifer; Melissa Rada - NOAA Affiliate
Subject: Latest Draft of Response to Comments

All--

As we discussed on the call, see attached for latest version of response to comments. This draft reflects comments from Jayne on all general comments and from Don on part of the general comments.

The Table of Contents notes what comments have responses drafted and which do not. If highlighted in yellow, I've developed a response. Last week I had some time and started looking at the forestry section. After setting the comments aside for awhile, I saw some ways we could streamline some of those comments a bit more to combine similar concepts under the same heading and avoid some repetition among comments. Therefore, you'll see these summary comments are slightly different than the version I sent around before. I developed a partial response to Forestry Comment A but have some placeholders to go back and flesh things out further. I plan to work on that a bit more today.

Since the tech teams' expertise is likely best spent doing the research to bolster our rationales, I'm happy to continue to work my way through responses to other comments as well, or at least framing up a potential structure for the response and leaving some gaps for the tech teams to fill in. Whatever folks find most useful to help keep this moving forward.

Allison

On Mon, Aug 25, 2014 at 9:13 PM, Carlin, Jayne <Carlin.Jayne@epa.gov> wrote:

OR CZARA Meeting

August 26 at 10 AM WA/OR or 1 PM DC

Non-Responsive or Dave's Office

Agenda

Updates & Status

Follow up from August 20 Managers' Call, Action Items Review & Change in Direction

Forestry/Riparian Rationale (see 8/23 email from Alan)

Forestry/landslides Rationale and update—questions answered and information needed in order to elevate (Alan)

OSDS rationale/setting precedent revisited (Don)

Review of revised agendas for managers meetings (see below)

Draft Agenda for September 4th meeting (90 minutes)

- Introductions/Agenda Review/Action Items from Aug 20th meeting (Jayne)
- Forestry/Riparian Rationale (Alan)
- Forestry/landslides Rationale and update—questions answered and information needed in order to elevate (Alan)
- OSDS rationale/setting precedent revisited (Don)
- Next Steps

Draft Agenda for September 10th meeting (60 minutes)

- Forestry/roads issue (Alan)

- Handling Forestry/Pesticides and Ag and next steps
- Issue elevation —what do the managers need from staff and attorneys
- Schedule and next steps

Action Items/Next Steps

Action Items

- The Forestry/Pesticides team will look into notification requirements in neighboring states; what makes Oregon unique or different; the scientific basis or record to support why FIFRA label compliance would not be considered sufficient to provide adequate protection of type N non-fish bearing streams from aerial application of herbicides; whether Oregon Toxics standard is relevant to addressing this condition; and the exact wording of this condition from the 1988 findings, focusing on whether it directly references buffers (*it does*).
- All will review the Ag MM paper to better prepare for the Sept 4th call.
- JB will find out the date by which the legal team expects to complete the review of the rationales for interim approval for OSDS and New Development MMs and provide comments to Don Waye.
- The managerial team will complete the reviews the rationales for interim approval for New Development MMs and OSDS and provide comments to Don Waye by August 29.
- Joelle will follow up with Jeff on the date that the legal team will complete the talking points for management and to help the technical team craft a response to comments regarding additional management measures.
- Forestry/landslides team will provide the following information to the managerial team in the form of talking points: comparison to how Washington addresses high risk landslides' potential impact to water quality in forested areas; EPA/NOAA expectations and suggestions on how Oregon can address this additional MM; whether we have the data to identify landslide prone areas and nearby receiving waters. *Will be discussed on Sept 4th call.*
- Allison will provide Jayne with dates and times that the NOAA team are available during late September through October. ***Done***

Upcoming September Meetings

Sept 2	10/1	OR CZARA
Sept 4	9/12	OR CZARA Mgrs
Sept 9	10/1	OR CZARA
Sept 10	12/3	OR CZARA Mgrs
Sept 16	10/1	OR CZARA
Sept 18	12/3	OR CZARA Mgrs

Sept 22	10/1	OR CZARA Mgrs
Sept 23	10/1	OR CZARA
Sept 29	10:30/1:30	OR CZARA Mgrs
Sept 30	10/1	OR CZARA

Jayne Carlin, Watersheds Unit
 US EPA, Region 10
 1200 6th Ave, Suite 900 (OWWW-134)
 Seattle, WA 98101-3140
 (206) 553-8512, (206) 553-0165 (fax)
carlin.jayne@epa.gov

<http://www.epa.gov/r10earth/tmdl.htm>

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Allison Castellan

Coastal Management Specialist

Office of Ocean and Coastal Resource Management N/ORM3

National Oceanic and Atmospheric Administration, SSMC4

Silver Spring, MD 20910

Phone: [301-563-1125](tel:301-563-1125)

Fax: [301-713-4004](tel:301-713-4004)

allison.castellan@noaa.gov

<http://coastalmanagement.noaa.gov>

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Coastal Management Specialist

Office of Ocean and Coastal Resource Management N/ORM3

National Oceanic and Atmospheric Administration, SSMC4

Silver Spring, MD 20910

Phone: 301-563-1125

Fax: 301-713-4004

allison.castellan@noaa.gov

<http://coastalmanagement.noaa.gov>